

**From:** "Paul Langewisch" <p.langewisch@bank-star.com> on 06/16/2005 02:52:34 PM

**Subject:** Classification of Commercial Credit Exposures

Gentleman: I attended the Conference of State Bank Supervisors and your proposed regulation was a topic of a "breakout session". Needless to say, the comments toward your proposal were very negative from the sample of bankers in attendance.

As a lifelong Missouri banker, I feel this is a needless change and will not help small and medium size banks. Our loan officers are very familiar with the credits and having this new system will not be of any help to us. In fact, if your law is passed, we will have to change our loan policies, procedures, rewriting loan loss allowances and retraining personnel to make the changes. This is all very costly for a bank of our size, which is \$86,000,000. We are already stressed in both personnel cost and compliance stress with the laws already on the books and we do not need this proposed change on top of what we already have.

One final note, if this proposal is needed, it should be restricted to the largest, most complex banking organizations that you monitor. We small banks already bear over regulation regarding federal and state laws. I see no valid need for this commercial regulation for banks our size.

Sincerely,  
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